

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

JESSICA LANGFORD,

Plaintiff,

v.

CITY OF ST. LOUIS, MISSOURI,

Defendant.

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Case No. 4:18-cv-2037

**JOINT MOTION FOR LEAVE TO DESIGNATE A NEUTRAL NOT CERTIFIED BY THE COURT**

Pursuant to E.D.Mo. L.R. 6.03(B)(2), the parties ask this Court for leave to designate Lisa S. Van Amburg, who is not on the list of certified neutrals maintained by the Court, to act as the neutral for mediation in this case. In support, they state:

1. On July 18, 2019, this Court referred this matter for mediation. ECF No. 11.
2. After consultation, the parties wish to designate Lisa S. Van Amburg as the neutral in this case.
3. Ms. Van Amburg is not on the list of certified neutrals maintained by this Court.
4. Local Rule 6.03(B)(2) provides that the “[p]arties must file a motion for leave to designate a neutral not on the list of certified neutrals maintained by the Court. The motion must include the reason for the selection of the neutral.”
5. The Rule anticipates that leave to designate a neutral who has not been certified may be appropriate where the proposed neutral “has special subject matter expertise germane to a particular case.”
6. Ms. Van Amburg has special subject matter expertise germane to this particular case. She was admitted to the Missouri Bar in 1975. She was active in fostering community programs that focus on restorative justice. She maintained a litigation practice, which

included state and federal courts, from 1996 to 2003. From 2003 to 2012, she served as a Circuit Judge for the Twenty-Second Judicial Circuit. From 2012 to 2018, she was a judge on the Missouri Court of Appeals, Eastern District. She is now a Professor of Practice at Saint Louis University School of Law. Ms. Van Amburg's expertise in Missouri law and familiarity with the practices within the City of St. Louis will aid in resolution of this case.

WHEREFORE the parties request leave to designate Lisa S. Van Amburg as mediator in this case despite her absence from the list of certified neutrals maintained by this Court.

Respectfully submitted,

/s/ Anthony E. Rothert

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